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10
11 UNITED STATES DISTRICT COURT
12 CENTRAL DISTRICT OF CALIFORNIA
13 WESTERN DIVISION

14 SUMMIT ENTERTAINMENT, LLC, a
15 Delaware limited liability company,

16 Plaintiff,

17 v.

18 DAIANA SANTIA, an individual;
19 HECTOR SANTIA, an individual; and
JOHN DOES 1-10,

20 Defendants.

Case No: **CV11-06310** ODW (SS)

COMPLAINT FOR:

- 1. VIOLATION OF THE COMPUTER FRAUD AND ABUSE ACT (18 U.S.C. § 1030)**
- 2. VIOLATION OF CALIFORNIA PENAL CODE § 502;**
- 3. TRESPASS TO CHATTELS;**
- 4. FEDERAL COPYRIGHT INFRINGEMENT (17 U.S.C. §§ 501, et seq.)**

DEMAND FOR JURY TRIAL

11 AUG - 1 AM 10:14
CLERK'S OFFICE
CENTRAL DISTRICT OF CALIF.
LOS ANGELES
BY: _____

1
2 Plaintiff, Summit Entertainment, LLC (“Summit” or “Plaintiff”), through its
3 attorneys, complaining of Defendants DAIANA SANTIA, HECTOR SANTIA, and
4 JOHN DOES 1-10 (collectively “Defendants”), alleges as follows:

5 **JURISDICTION AND VENUE**

6 1. This lawsuit arises from Defendants’ willful and malicious violation of
7 the civil and criminal statutes of the United States and the State of California,
8 including the federal Computer Fraud and Abuse Act (18 U.S.C. § 1030), California
9 Penal Code § 502, and the federal Copyright Act (15 U.S.C. §§ 501, *et seq.*), and also
10 from Defendants’ unlawful trespass to chattels under California common law. This
11 Court has jurisdiction over the federal causes of action pursuant to 17 U.S.C. § 501,
12 28 U.S.C. § 1331, and § 1338(a). The Court has supplemental jurisdiction over the
13 California statutory and common law claims pursuant to 28 U.S.C. § 1367. Venue in
14 this district is proper pursuant to 28 U.S.C. § 1391(b)(2).

15 2. This Court has personal jurisdiction over Defendants, who have directed
16 tortious acts at Summit in this District, and have committed tortious acts that they
17 knew or should have known would cause injury to Summit in this District.

18 **THE PARTIES**

19 3. Summit is a limited liability company organized and existing under the
20 laws of the State of Delaware, having its principal place of business in Santa Monica,
21 California.

22 4. Summit owns rights in and to the feature films “The Twilight Saga:
23 Breaking Dawn – Part I” and “The Twilight Saga: Breaking Dawn – Part 2” including
24 all images and elements contained therein (collectively, the “Films”). The Films,
25 including without limitation the images and audio contained therein, are entitled to
26 protection under federal copyright law.

27 5. Summit is informed and believes and on that basis alleges that defendant
28 Daiana Santia is an individual currently residing in the city of Posadas, Argentina.

1 6. Summit is informed and believes and on that basis alleges that defendant
2 Hector Santia is an individual currently residing in the city of Posadas, Argentina.

3 7. Summit is currently unaware of the identities of defendants John Does 1-
4 10 (the “Doe Defendants”), and therefore sues the Doe Defendants by such fictitious
5 acronyms. Summit is informed and believes that discovery will reveal the true
6 identities of the Doe Defendants, and will amend this Complaint to identify the Doe
7 Defendants by name after their identities are discovered.

8 8. Summit is informed and believes and on that basis alleges that the actions
9 alleged herein to have been undertaken by Defendants were undertaken by each
10 Defendant individually, were actions that each Defendant caused to occur, were
11 actions that each Defendant authorized, controlled, directed, or had the ability to
12 authorize, control or direct, and/or were actions in which each Defendant assisted,
13 participated or otherwise encouraged, and are actions for which each Defendant is
14 liable. Each Defendant aided and abetted the actions of the other Defendants, in that
15 each Defendant had knowledge of those actions, provided assistance and benefitted
16 from those actions, in whole or in part. Each of the Defendants was the agent of each
17 of the other Defendants, and in doing the things hereinafter alleged, was acting within
18 the course and scope of such agency and with the permission and consent of the other
19 Defendants.

20 **SUMMIT’S RIGHTS AND DEFENDANTS’ UNLAWFUL CONDUCT**

21 9. The Films are the final films in the “The Twilight Saga” series. The first
22 three films in this series were “Twilight”, “The Twilight Saga: New Moon”, and “The
23 Twilight Saga: Eclipse”. This series has resulted in worldwide theatrical box office
24 receipts in excess of \$1.8 billion dollars (\$1,800,000,000).

25 10. During the course of production of the Films, Summit has created and
26 stored elements of the Films, including but not limited to film footage, audio and
27 photographs (the “Content”) on secure computer servers and accounts (the “Servers”).

11. Summit owns all rights in the Content, including without limitation all relevant copyrights, and strictly limits access to the Content. Among other things, Summit utilizes various technological security measures to ensure that only authorized individuals may access the Servers to view or download the Content. During the production of the Films, Summit has taken steps to ensure that the Content is kept strictly confidential and only releases select images and video content prior to the Films' release as part of its detailed marketing and promotion plans.

12. Summit is informed and believes and on that basis alleges that in or about October of 2010, Defendants began attempting to access the Servers surreptitiously and without authorization, and that Defendants succeeded in gaining unauthorized access to the Servers on multiple occasions in 2010 and 2011.

13. Summit is informed and believes and on that basis alleges that Defendants accessed, viewed and downloaded Summit's Content from the Servers without authorization, and that Defendants subsequently reproduced, altered, and distributed copies of the Content (collectively the "Infringing Material") through various means, including without limitation by email, through social networking services such as Twitter and Tumblr, and by posting the Infringing Material on various Internet websites.

14. Defendants' creation, reproduction and distribution of the Infringing Material has been without authorization and is without Summit's consent. Defendants have acted with willful and intentional disregard of Summit's rights, and Summit has sustained substantial and irreparable damage as a result thereof. In light of the fact that the Defendants have copied and stolen the Content prior to the release of the Films, their conduct has been particularly damaging to Summit.

FIRST CAUSE OF ACTION

(Violation of Computer Fraud and Abuse Act – Against All Defendants)

[18 U.S.C. § 1030]

15. Summit refers to, repeats and realleges all allegations contained in

1 Paragraphs 1 through 14 of this Complaint and incorporates them by reference as
2 though set forth in full.

3 16. The Servers are involved in interstate and foreign commerce and
4 communication, and are protected under 18 U.S.C. § 1030(e)(2).

5 17. Defendants have intentionally accessed the Servers without authorization
6 and have, through interstate or foreign communication, obtained information from the
7 Servers in violation of 18 U.S.C. § 1030(a)(2)(c).

8 18. Defendants have, knowingly and with intent to defraud, accessed the
9 Servers without authorization, furthered the intended fraud, and obtained valuable
10 Content in violation of 18 U.S.C. § 1030(a)(4).

11 19. Defendants' actions have caused loss to one or more persons, including
12 without limitation Summit, in a one year period aggregating at least \$5,000 in value.

13 20. Defendants' conduct as alleged herein has caused and will continue to
14 cause Summit irreparable harm for which there is no adequate remedy at law, and is
15 also causing damage to Summit in an amount which cannot be accurately computed at
16 this time but will be proven at trial.

17 **SECOND CAUSE OF ACTION**

18 **(Violation of California Penal Code § 502 – Against All Defendants)**

19 21. Summit refers to, repeats and realleges all allegations contained in
20 Paragraphs 1 through 20 of this Complaint and incorporates them by reference as
21 though set forth in full.

22 22. The Servers constitute computers, computer systems, and/or computer
23 networks for purposes of California Penal Code § 502.

24 23. Defendants have knowingly accessed and without permission made use
25 of data from the Servers in order to wrongfully control or obtain money, property, or
26 data in violation of California Penal Code § 502(c)(1)(B).

27 24. Defendants have knowingly accessed and without permission taken,
28 copied or made use of data from the Servers in violation of California Penal Code §

1 502(c)(2).

2 25. Defendants have knowingly and without permission used computer
3 services in violation of California Penal Code § 502(c)(3).

4 26. Defendants have knowingly and without permission provided or assisted
5 in providing a means of accessing the Servers in violation of California Penal Code §
6 502(c)(6).

7 27. Defendants have knowingly and without permission accessed or caused
8 to be accessed the Servers in violation of California Penal Code § 502(c)(7).

9 28. Defendants' actions as alleged herein have caused Summit to suffer
10 damage and loss in an amount to be proven at trial.

11 29. Defendants' actions as alleged herein have been oppressive, fraudulent or
12 malicious. Summit requests punitive or exemplary damages pursuant to California
13 Civil Code § 3294(a) in an amount sufficient to punish and deter Defendants and to
14 make an example of Defendants.

15 30. Defendants' actions as alleged herein have caused and will continue to
16 cause Summit irreparable harm for which there is no adequate remedy at law, and are
17 also causing damage to Summit in an amount which cannot be accurately computed at
18 this time but will be proven at trial.

19 31. This Court has jurisdiction over the subject matter of this claim pursuant
20 to the provisions of 28 U.S.C. § 1367.

21 **THIRD CAUSE OF ACTION**

22 **(Trespass to Chattels – Against All Defendants)**

23 32. Summit refers to, repeats and realleges all allegations contained in
24 Paragraphs 1 through 31 of this Complaint and incorporates them by reference as
25 though set forth in full.

26 33. Summit has a possessory interest in the Servers. Defendants have
27 intentionally and without authorization interfered with Summit's possessory interest in
28 the Servers by accessing the Servers and viewing and downloading Content from the

Servers without authorization.

34. Defendants' conduct as alleged herein has caused and will continue to cause Summit irreparable harm for which there is no adequate remedy at law, and is also causing damage to Summit in an amount which cannot be accurately computed at this time but will be proven at trial.

35. Defendants' actions as alleged herein have been oppressive, fraudulent or malicious. Summit requests punitive or exemplary damages pursuant to California Civil Code § 3294(a) in an amount sufficient to punish and deter Defendants and to make an example of Defendants.

36. This Court has jurisdiction over the subject matter of this claim pursuant to the provisions of 28 U.S.C. § 1367.

FOURTH CAUSE OF ACTION

(Federal Copyright Infringement – Against All Defendants)

[17 U.S.C. §§ 501, *et seq.*]

37. Summit refers to, repeats and realleges all allegations contained in Paragraphs 1 through 36 of this Complaint and incorporates them by reference as though set forth in full.

38. At all relevant times, Summit has owned the rights, titles, and interest in and to the Content.

39. Summit owns Federal Copyright Registration Nos. PAu3-521-211 and PAu3-521-218 for the screenplays to the Films, and owns the copyrights in all derivative works based thereon, including without limitation the Content.

40. Summit has registered numerous images and clips related to the Films. A schedule listing relevant registrations and applications is attached as Exhibit 1.

41. Defendants have willfully and intentionally infringed Summit's rights, including each of the copyrights referenced in paragraphs 39-40, by creating, reproducing and distributing the Infringing Material without Summit's consent.

42. Defendants' conduct as alleged herein has caused and will continue to cause Summit irreparable harm for which there is no adequate remedy at law, and is also causing damage to Summit in an amount which cannot be accurately computed at this time but will be proven at trial.

PRAYER FOR RELIEF

WHEREFORE, Summit demands judgment against the Defendants jointly and severally, and demands that the Court grant Summit relief against the Defendants jointly and severally as follows:

1. That the Court enter a preliminary injunction and a permanent injunction prohibiting Defendants and each of them, and all those acting in active concert or participation with them or any of them from:

- a. Accessing the Servers or any other computers, computer systems or computer networks owned, leased, operated or controlled by Summit directly or indirectly in any manner;
- b. Accessing, viewing, downloading, or otherwise obtaining the Content or any unreleased film, audio, photographs or other constituent elements of the Films or of any other films owned by Summit;
- c. Perpetrating, furthering or undertaking any fraud or deceit on Summit or its employees, agents, directors, members, officers, contractors, or any other person or entity acting at Summit's direction and control, or in active concert with Summit;
- d. Using, reproducing, distributing, selling or offering for sale, the Content, the Infringing Material, or any other Summit images or films; and
- e. Effecting assignments or transfers, forming new entities or associations or utilizing any other device for the purpose of circumventing or otherwise avoiding the prohibitions set forth herein.

2. That the Court order Defendants and each of them to deliver to Summit, at Defendants' cost, all hard copy and electronic copies of the Content and the Infringing

1 Material, as well as any other images or films owned by Summit, or any portions or
2 modifications thereof, within the possession, custody or control of Defendants and any
3 of them, pursuant to an appropriate protocol for identifying and retrieving all
4 infringing electronically stored information within the possession, custody or control
5 of Defendants and any of them.

6 3. That the Court order Defendants and each of them to (a) take all steps
7 necessary to recall and recover all copies of the Infringing Material that they have
8 published, distributed, or otherwise made available to any other person at any time, (b)
9 turn over such recalled and recovered copies to Summit, and (c) provide Summit with
10 all information in Defendants' possession, custody, or control which may identify
11 such recipients of the Infringing Material.

12 4. That the Court order an award to Summit against each Defendant, for all
13 claims asserted in this complaint, as follows:

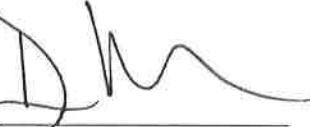
- 14 a. An award to Summit of compensatory damages against Defendants and
15 each of them, pursuant to 18 U.S.C. § 1030(g) and California Penal Code
16 §502(e)(1), along with prejudgment and post-judgment interest;
- 17 b. An award to Summit of damages against Defendants and each of them
18 for Defendants' copyright infringement as: (i) Summit's actual damages
19 (including without limitation lost profits) suffered as a result of
20 Defendants' infringement as well as Defendants' profits derived from
21 their unlawful infringement of Summit's copyrighted works; or (ii)
22 statutory damages of \$150,000 for each infringed work as set forth in 17
23 U.S.C. § 504, at Summit's election before the entry of a final judgment,
24 together with prejudgment and post-judgment interest; and
- 25 c. An order from the Court that Defendants and each of them account for
26 and pay over to Summit profits realized by Defendants by reason of their
27 unlawful acts herein alleged and the award to Summit be increased as
28 provided by law.

1 5. That the Court award Summit its costs of suit incurred herein, including its
2 attorneys' fees and investigators' fees incurred by Summit in investigating
3 Defendants' unlawful conduct, as provided by applicable law.

4 6. That the Court retain jurisdiction of this action for the purpose of enabling
5 Summit to apply to the Court at any time for such further orders and interpretation or
6 execution of any order entered in this action, for the modification of any such order,
7 for the enforcement or compliance therewith and for the punishment of any violations
8 thereof.

9 7. That the Court grant Summit such other and further relief as it deems just
10 and equitable to make Summit whole for the damage caused by Defendants.

11
12 Dated: July 29, 2011
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By: 

Dennis L. Wilson
Keats McFarland & Wilson LLP
Attorneys for Plaintiff
SUMMIT ENTERTAINMENT,
LLC

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JURY DEMAND

Plaintiff Summit Entertainment, LLC respectfully requests a jury trial on all issues so triable set forth in this Complaint.

Dated: July 29, 2011

By: Dennis L. Wilson
Dennis L. Wilson
Keats McFarland & Wilson LLP
Attorneys for Plaintiff
SUMMIT ENTERTAINMENT,
LLC

Exhibit 1

EXHIBIT 1

Select U.S. Copyright Office Applications and Registrations.

Registration/ Preregistration/Application Number	Name of Work
VAu001070245	GROUP REGISTRATION Photos, TSBD Camera Tests, 9 photos; unpublished
VAu001070246	GROUP REGISTRATION Photos, TSBD Greenscreens A, 2 photos; unpublished
VAu001070249	GROUP REGISTRATION Photos, TSBD Miscellaneous A, 2 photos; unpublished
VAu001070206	GROUP REGISTRATION Photos, TSBD Screengrabs A, 24 photos; unpublished
VAu001070205	GROUP REGISTRATION Photos, TSBD Screengrabs B, 7 photos; unpublished
VAu001070284	GROUP REGISTRATION Photos, TSBD Unit Photography A, 3 photos; unpublished
VAu001070276	GROUP REGISTRATION Photos, TSBD Wardrobe A, 8 photos; unpublished
VAu001070250	GROUP REGISTRATION Photos, TSBD Wardrobe B, 4 photos; unpublished
VAu001070248	TSBD Greenscreens B, 1 photo; unpublished
1-630611154	TSBD Unpublished Clip No. 1
1-631744031	TSBD Unpublished GIF No. 1
PRE 4659	The Twilight Saga: Breaking Dawn – Part 1
PRE 4661	The Twilight Saga: Breaking Dawn – Part 2

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

SUMMIT ENTERTAINMENT, LLC, a Delaware
limited liability company

CASE NUMBER

CV11-06310 ODW(ssx)

PLAINTIFF(S),

v.

DAIANA SANTIA, an individual; HECTOR
SANTIA, an individual; and JOHN DOES 1-
10,

SUMMONS

DEFENDANT(S).

TO: THE ABOVE-NAMED DEFENDANT(S):

YOU ARE HEREBY SUMMONED and required to file with this court and serve upon plaintiffs' attorney Dennis L. Wilson, whose address is:

KEATS MCFARLAND & WILSON LLP
9720 Wilshire Boulevard, Penthouse Suite
Beverly Hills, California 90212
Telephone: (310) 248-3830
Facsimile: (310) 860-0363

an answer to the **complaint** **amended complaint** **counterclaim** **cross-claim** which is herewith served upon you within twenty (21) days after service of this Summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

AUG - 1 2011

Clerk, U. S. District Court

DATE: _____

By _____

Deputy Clerk

(Seal of the Court)

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEETI (a) PLAINTIFFS (Check box if you are representing yourself)SUMMIT ENTERTAINMENT, LLC,
a Delaware limited liability company

DEFENDANTS

DAIANA SANTIA, an individual;
HECTOR SANTIA, an individual;
and JOHN DOES 1-10

(b) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.)
 Dennis L. Wilson (State Bar No. 155407) dwilson@kmwlaw.com
 David K. Caplan (Bar No. 181174) dcaplan@kmwlaw.com
 Christopher T Varas (Bar No. 257080) cvaras@kmwlaw.com
 KEATS, MCFARLAND & WILSON LLP
 9720 Wilshire Boulevard, Penthouse Suite
 Beverly Hills, California 90212
 Telephone: (310) 248-3830 Facsimile: (310) 860-0363

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an X in one box only.)

1 U.S. Government Plaintiff 3 Federal Question (U.S. Government Not a Party)
 2 U.S. Government Defendant 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES - For Diversity Cases Only
(Place an X in one box for plaintiff and one for defendant.)

	PTF	DEF	PTF	DEF	
Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	<input type="checkbox"/> 4	<input type="checkbox"/> 4
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6

IV. ORIGIN (Place an X in one box only.)

1 Original 2 Removed from 3 Remanded from 4 Reinstated or 5 Transferred from another district (specify): 6 Multi-District Litigation 7 Appeal to District Judge from Magistrate Judge
 Proceeding State Court Appellate Court Reopened

V. REQUESTED IN COMPLAINT: JURY DEMAND: Yes No (Check 'Yes' only if demanded in complaint.)CLASS ACTION under F.R.C.P. 23: Yes No

□ MONEY DEMANDED IN COMPLAINT: \$ _____

VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)
 Violation of the Computer Fraud and Abuse Act (18 U.S.C. § 1030); Violation of California Penal code § 502; Trespass to Chattels; and Federal Copyright Infringement (17 U.S.C. §§ 501, et seq.)

VII. NATURE OF SUIT (Place an X in one box only.)

OTHER STATUTES	CONTRACT	TORTS	TORTS	PRISONER	LABOR
<input type="checkbox"/> 400 State Reapportionment	<input type="checkbox"/> 110 Insurance	PERSONAL INJURY	PERSONAL PROPERTY	PETITIONS	<input type="checkbox"/> 710 Fair Labor Standards Act
<input type="checkbox"/> 410 Antitrust	<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 370 Other Fraud	<input type="checkbox"/> 510 Motions to Vacate Sentence	<input type="checkbox"/> 720 Labor/Mgmt. Relations
<input type="checkbox"/> 430 Banks and Banking	<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 371 Truth in Lending	Habeas Corpus	<input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act
<input type="checkbox"/> 450 Commerce/ICC Rates/etc.	<input type="checkbox"/> 140 Negotiable Instrument	<input type="checkbox"/> 320 Assault, Libel & Slander	<input type="checkbox"/> 380 Other Personal Property Damage	<input type="checkbox"/> 530 General	<input type="checkbox"/> 740 Railway Labor Act
<input type="checkbox"/> 460 Deportation	<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 330 Fed. Employers' Liability	<input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 535 Death Penalty	<input type="checkbox"/> 790 Other Labor Litigation
<input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations	<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 340 Marine	<input type="checkbox"/> 422 Appeal 28 USC 158	<input type="checkbox"/> 540 Mandamus/ Other	<input type="checkbox"/> 791 Empl. Ret. Inc. Security Act
<input type="checkbox"/> 480 Consumer Credit	<input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Veterans)	<input type="checkbox"/> 345 Marine Product Liability	<input type="checkbox"/> 423 Withdrawal 28 USC 157	CIVIL RIGHTS	<input type="checkbox"/> 820 Copyrights
<input type="checkbox"/> 490 Cable/Sat TV	<input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits	<input type="checkbox"/> 350 Motor Vehicle	<input type="checkbox"/> 441 Voting	<input type="checkbox"/> 610 Agriculture	<input type="checkbox"/> 830 Patent
<input type="checkbox"/> 810 Selective Service	<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 355 Motor Vehicle Product Liability	<input type="checkbox"/> 442 Employment	<input type="checkbox"/> 620 Other Food & Drug	<input type="checkbox"/> 840 Trademark
<input type="checkbox"/> 850 Securities/Commodities/ Exchange	<input type="checkbox"/> 161 Other Contract	<input type="checkbox"/> 360 Personal Injury-Med Malpractice	<input type="checkbox"/> 443 Housing/Accommodations	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881	<input type="checkbox"/> 861 HIA (1395ff)
<input type="checkbox"/> 875 Customer Challenge 12 USC 3410	<input type="checkbox"/> 190 Other Contract	<input type="checkbox"/> 362 Personal Injury-Med Malpractice	<input type="checkbox"/> 444 Welfare	<input type="checkbox"/> 630 Liquor Laws	<input type="checkbox"/> 862 Black Lung (923)
<input type="checkbox"/> 890 Other Statutory Actions	<input type="checkbox"/> 195 Contract Product Liability	<input type="checkbox"/> 365 Personal Injury-Product Liability	<input type="checkbox"/> 445 American with Disabilities - Employment	<input type="checkbox"/> 640 R.R. & Truck	<input type="checkbox"/> 863 DIWC/DIWW (405(g))
<input type="checkbox"/> 891 Agricultural Act	<input type="checkbox"/> 196 Franchise	<input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	<input type="checkbox"/> 446 American with Disabilities - Other	<input type="checkbox"/> 650 Airline Regs	<input type="checkbox"/> 864 SSID Title XVI
<input type="checkbox"/> 892 Economic Stabilization Act	<input type="checkbox"/> 210 Land Condemnation	<input type="checkbox"/> 462 Naturalization Application	<input type="checkbox"/> 447 Other Civil Rights	<input type="checkbox"/> 660 Occupational Safety /Health	<input type="checkbox"/> 865 RSI (405(g))
<input type="checkbox"/> 893 Environmental Matters	<input type="checkbox"/> 220 Foreclosure	<input type="checkbox"/> 463 Habeas Corpus-Alien Detainee		<input type="checkbox"/> 690 Other	<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)
<input type="checkbox"/> 894 Energy Allocation Act	<input type="checkbox"/> 230 Rent Lease & Ejectment	<input type="checkbox"/> 465 Other Immigration Actions			<input type="checkbox"/> 871 IRS-Third Party 26 USC 7609
<input type="checkbox"/> 895 Freedom of Info. Act	<input type="checkbox"/> 240 Torts to Land				
<input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice	<input type="checkbox"/> 245 Tort Product Liability				
<input type="checkbox"/> 950 Constitutionality of State Statutes	<input type="checkbox"/> 290 All Other Real Property				

CV11-06310

FOR OFFICE USE ONLY: Case Number: _____

AFTER COMPLETING THE FRONT SIDE OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED BELOW.

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET

VIII(a). IDENTICAL CASES: Has this action been previously filed in this court and dismissed, remanded or closed? No Yes
If yes, list case number(s): _____

VIII(b). RELATED CASES: Have any cases been previously filed in this court that are related to the present case? No Yes
If yes, list case number(s): _____

Civil cases are deemed related if a previously filed case and the present case:

(Check all boxes that apply) A. Arise from the same or closely related transactions, happenings, or events; or
 B. Call for determination of the same or substantially related or similar questions of law and fact; or
 C. For other reasons would entail substantial duplication of labor if heard by different judges; or
 D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

IX. VENUE: (When completing the following information, use an additional sheet if necessary.)

(a) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH named plaintiff resides.
 Check here if the government, its agencies or employees is a named plaintiff. If this box is checked, go to item (b).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Summit Entertainment, LLC, Los Angeles County	

(b) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH named defendant resides.
 Check here if the government, its agencies or employees is a named defendant. If this box is checked, go to item (c).

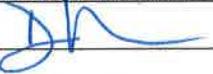
County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Daiana Santia, Argentina Hector Santia, Argentina	

(c) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH claim arose.
Note: In land condemnation cases, use the location of the tract of land involved.

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Los Angeles County	

* Los Angeles, Orange, San Bernardino, Riverside, Ventura, Santa Barbara, or San Luis Obispo Counties

Note: In land condemnation cases, use the location of the tract of land involved

X. SIGNATURE OF ATTORNEY (OR PRO PER): 

Date

7/29/11

Notice to Counsel/Parties: The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet.)

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405(g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405(g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. (g))